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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

MICHELLE WRIGHT and	)	
DAREN WRIGHT,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
ANNA LISE KOENIG, M.D.,	)	
	)	
Defendant.	)	Case No. _____
_____	)	

**COMPLAINT FOR MEDICAL MALPRACTICE**

COME NOW plaintiffs and allege as follows:

- 1) Plaintiff Michelle Wright [hereinafter "Michelle"] is an adult Alaskan Native.
- 2) Plaintiffs are residents of Anchorage, Alaska.
- 3) Plaintiffs are legally married.

4) The Alaska Native Medical Center [hereinafter "ANMC"] is a state-of-the-art hospital located in Anchorage, Alaska offering comprehensive health-care to Alaskan Natives.

5) The Phoenix Integrated Surgical Residency is a surgical training program for medical residents based at Banner - University Medical Center Phoenix in Phoenix, Arizona. The residency has a primary affiliation with the University of Arizona College of Medicine – Phoenix.

6) ANMC is a training site for medical residents from the Phoenix Integrated Surgical Residency.

7) Upon information and belief, Anna Lise Koenig, M.D. [hereinafter "Dr. Koenig"], was, at all times pertinent, working as a medical resident at ANMC.

8) Upon information and belief, Dr. Koenig was, at all times pertinent, employed by the Phoenix Integrated Surgical Residency, and is a resident of Arizona.

9) ANMC is owned and operated by the Alaska Native Tribal Health Consortium, a non-profit tribal health organization and co-signatory to the Alaska Tribal Health Compact.

10) The instant action is properly brought pursuant to the federal diversity statute, 28 USC § 1332.

11) On or about June 5 or 6, 2018, Michelle presented herself to the ANMC for treatment of abdominal problems.

12) Dr. Koenig treated Michelle during her visit and stay at the ANMC.

13) Dr. Koenig was, at all times pertinent, acting as an agent of ANMC.

14) During Michelle's above-referenced stay at the ANMC, she was found to have a small bowel obstruction.

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15) On or about June 6, 2018, she was admitted and underwent abdominal surgery.

16) While convalescing at the ANMC following said surgery, she developed a post-operative ileus with partial bowel obstruction, as well as a *C Difficile* ["C-diff"] infection.

17) As part of her post-operative care, practitioners inserted a nasogastric tube ["NGT"] for the administration of nourishment and/or medication.

18) The NGT was prematurely removed.

19) By June 13, 2018, Michelle's condition had significantly worsened. She developed signs and symptoms of sepsis.

20) On or about June 14, 2018, she experienced profound respiratory distress, aspirated copious amounts of gastric fluid, lost consciousness, suffered cardiac arrest, and suffered a brain injury.

21) Michelle's brain injury is the direct and proximate result of negligent and substandard medical care and treatment, including the care of Dr. Koenig.

22) Said lapses in care include, *but are not limited to*: (a) failing to monitor, diagnose, and treat Michelle's deteriorating condition following surgery; (b) failing to address her SIRS criteria on 6/13 which included increased white blood count and early acidosis, as well as her nausea, pain, and distended abdomen; and (c) failing to timely send her to the ICU for proper diagnosis and treatment that would have likely avoided the cardiac arrest and subsequent brain injury.

23) Yet-to-be-conducted discovery and/or expert analysis may reveal further lapses in care and treatment.

24) The substandard medical care and treatment alleged herein constituted recklessness for purposes of AS 09.55.549(f).

25) As a direct and proximate result of the substandard care and treatment alleged herein, Michelle has and will suffer the following economic losses, both past and future: (a) medical treatment; (b) loss of earnings and earning capacity; (c) loss of household- and non-market services; (d) inability to engage in subsistence activity, and; (e) other consequential and out-of-pocket expenses and damages.

26) As a direct and proximate result of the substandard care and treatment alleged herein, Michelle has and will suffer non-economic damages, both past and future, as allowed by AS 09.55.549(c).

27) As a direct and proximate result of the substandard care and treatment alleged herein, plaintiff Daren Wright has and will suffer loss of spousal consortium, services, love, and support.

\* \* \* \* \*

WHEREFORE plaintiffs pray for judgment awarding --

- 1) Compensatory damages to both plaintiffs in excess of \$75,000;
- 2) Costs and attorney's fees as allowable;
- 3) Any other relief the court deems equitable.

DATED AT Anchorage, Alaska this 11<sup>th</sup> day of June, 2020.

THE LAW OFFICES OF DAVID HENDERSON

Attorneys for Plaintiffs  
Michelle Wright and Daren Wright

s/ David Henderson  
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